

Message

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**From:** Bauer, Jeff [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A4558BD6EF54412BAE4A992C7C807E24-JBAUER]  
**Sent:** 7/9/2020 2:59:57 PM  
**To:** MongThu Ngo [mongthu.ngo@basf.com]  
**Subject:** RE: PMN status update

MongThu,

Good Morning, I wanted to touch up on a few things, I am going to send you Authorization forms so that we can exchange CBI over the email. Your listed as a contact on 383 but not on 301.

The meeting yesterday will keep 301 as a lung sensitizer and the SDS for this case needs: eye irritation, skin irritation, skin sensitization, and lung sensitization.

Also: impervious gloves and clothing, eye protection, NIOSH approved respirator with an APF of 50 and an APF of 1000 if spray applied.

Once you update the SDS this case would be a Not Likely.

For 383 you still need to address the water releases and you do have the engineering report. If your unable to address the water releases we can do a Consent Order holding you to the Water trigger of 7 ppb and the APF of 1000. I can put all the GHS statements in the Order if you do not update the SDS. I sent the request to RAD to update the report since I am still waiting on your letter and doubt it will be successful in addressing the sensitization issue.

Jeff

Jeff Bauer - Program Manager  
United States Environmental Protection Agency (USEPA)  
Office of Pollution Prevention and Toxics (OPPT)  
New Chemicals Program (7405M)  
<http://www.epa.gov/oppt/newchems/>

EPA East Building, room 4133M  
1201 Constitution Ave., NW  
Washington, DC 20004  
Phone: 202-564-9042, Fax: 202-564-9490

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**From:** MongThu Ngo <mongthu.ngo@basf.com>  
**Sent:** Tuesday, June 30, 2020 1:23 PM  
**To:** Bauer, Jeff <Bauer.Jeff@epa.gov>  
**Subject:** RE: PMN status update

Hi Jeff,

Can you suspend both PMNs for another 30 days? Both businesses need more time to deliberate on next steps.

I will give you a call next week to provide an update.

Thank you!!

Please do not hesitate to contact me if you have any questions or concerns.

Best Regards,  
**MongThu Ngo, M.S., DABT**  
Product Registration Specialist – Dispersions & Resins North America

Phone: +1 248 948-2037, Mobile: +1-248-238-7436, Email: [mongthu.ngo@basf.com](mailto:mongthu.ngo@basf.com)  
Postal Address: BASF Corporation, 24700 West Eleven Mile Road, 48034 Southfield, United States  
Website: [www.basf.us/dpsolutions](http://www.basf.us/dpsolutions)

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**From:** MongThu Ngo  
**Sent:** Wednesday, June 17, 2020 9:32 AM  
**To:** Bauer, Jeff <[Bauer.Jeff@epa.gov](mailto:Bauer.Jeff@epa.gov)>  
**Subject:** RE: PMN status update

Hi Jeff,

I'll give you a call this afternoon – around 1 and 3pm.

Please do not hesitate to contact me if you have any questions or concerns.

Best Regards,  
**MongThu Ngo, M.S., DABT**  
Product Registration Specialist – Dispersions & Resins North America

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**From:** Bauer, Jeff <[Bauer.Jeff@epa.gov](mailto:Bauer.Jeff@epa.gov)>  
**Sent:** Tuesday, June 16, 2020 9:45 PM  
**To:** MongThu Ngo <[mongthu.ngo@basf.com](mailto:mongthu.ngo@basf.com)>  
**Subject:** RE: PMN status update

MongThu

Give me a call tomorrow so we can go over your two case I have with you. I took over this case from Meg. I think we can move these cases forward and address the sensitization issue on both cases.

Thanks

Jeff Bauer - Program Manager  
United States Environmental Protection Agency (USEPA)  
Office of Pollution Prevention and Toxics (OPPT)  
New Chemicals Program (7405M)  
<http://www.epa.gov/oppt/newchems/>

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---

**From:** Victor, Meg <[Victor.Meg@epa.gov](mailto:Victor.Meg@epa.gov)>  
**Sent:** Monday, June 15, 2020 5:36 PM  
**To:** MongThu Ngo <[mongthu.ngo@basf.com](mailto:mongthu.ngo@basf.com)>  
**Cc:** Bauer, Jeff <[Bauer.Jeff@epa.gov](mailto:Bauer.Jeff@epa.gov)>  
**Subject:** RE: PMN status update

Hi MongThu,

There is still a backlog in RAD, although they're making some progress in reducing it. I've copied Jeff Bauer on this message, I think you're worked with Jeff before. I recently took on some different responsibilities, and Jeff has kindly taken over as program manager on this PMN.

Many thanks for everything!

Best,  
Meg  
(202) 343-9193

---

**From:** MongThu Ngo <[mongthu.ngo@basf.com](mailto:mongthu.ngo@basf.com)>

**Sent:** Monday, June 15, 2020 5:13 PM

**To:** Victor, Meg <[Victor.Meg@epa.gov](mailto:Victor.Meg@epa.gov)>

**Subject:** RE: PMN status update

Hi Meg,

Is there still a backlog at RAD? We've been waiting 6 months for their review of our letter.

Please do not hesitate to contact me if you have any questions or concerns.

Best Regards,

**MongThu Ngo, M.S., DABT**

Product Registration Specialist – Dispersions & Resins North America

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**From:** MongThu Ngo

**Sent:** Friday, May 15, 2020 2:46 PM

**To:** Victor, Meg <[Victor.Meg@epa.gov](mailto:Victor.Meg@epa.gov)>

**Subject:** RE: PMN status update

Hi Meg,

Please suspend for another 30 days to June 18<sup>th</sup>.

Please do not hesitate to contact me if you have any questions or concerns.

Best Regards,

**MongThu Ngo, M.S., DABT**

Product Registration Specialist – Dispersions & Resins North America

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**From:** Victor, Meg <[Victor.Meg@epa.gov](mailto:Victor.Meg@epa.gov)>  
**Sent:** Friday, May 15, 2020 2:28 PM  
**To:** MongThu Ngo <[mongthu.ngo@basf.com](mailto:mongthu.ngo@basf.com)>  
**Subject:** RE: PMN status update

Hi MongThu,

I haven't seen an update from RAD yet. I recommend providing an additional suspension of 30-days to June 18<sup>th</sup>.

Best,  
Meg  
(202) 343-9193

---

**From:** MongThu Ngo <[mongthu.ngo@basf.com](mailto:mongthu.ngo@basf.com)>  
**Sent:** Thursday, April 16, 2020 12:21 PM  
**To:** Victor, Meg <[Victor.Meg@epa.gov](mailto:Victor.Meg@epa.gov)>  
**Subject:** RE: PMN status update

Hi Meg,

Thank you for the update. Hopefully we'll get an update from RAD next month.

Please extend the suspension to May 19<sup>th</sup>.

Please do not hesitate to contact me if you have any questions or concerns.

Best Regards,  
**MongThu Ngo, M.S., DABT**  
Product Registration Specialist – Dispersions & Resins North America

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**From:** Victor, Meg <[Victor.Meg@epa.gov](mailto:Victor.Meg@epa.gov)>  
**Sent:** Thursday, April 16, 2020 10:42 AM  
**To:** MongThu Ngo <[mongthu.ngo@basf.com](mailto:mongthu.ngo@basf.com)>  
**Subject:** RE: PMN status update

Hi MongThu,

No update yet from RAD on review of the supporting information that you provided. I recommend providing an additional 30-day suspension to May 19<sup>th</sup>.

Stay safe!

Meg  
(202) 343-9193

---

**From:** MongThu Ngo <[mongthu.ngo@basf.com](mailto:mongthu.ngo@basf.com)>  
**Sent:** Monday, March 16, 2020 12:18 PM  
**To:** Victor, Meg <[Victor.Meg@epa.gov](mailto:Victor.Meg@epa.gov)>  
**Subject:** RE: PMN status update

Hi Meg,

Please do another 30-day suspension to April 19<sup>th</sup>.

Stay safe!

Please do not hesitate to contact me if you have any questions or concerns.

Best Regards,  
**MongThu Ngo, M.S., DABT**  
Product Registration Specialist – Dispersions & Resins North America

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**From:** Victor, Meg <[Victor.Meg@epa.gov](mailto:Victor.Meg@epa.gov)>  
**Sent:** Monday, March 16, 2020 11:48 AM  
**To:** MongThu Ngo <[mongthu.ngo@basf.com](mailto:mongthu.ngo@basf.com)>  
**Subject:** RE: PMN status update

Hello MongThu,

There is no update from RAD on review of the information that you submitted. I recommend providing an additional 30-day suspension to April 19<sup>th</sup>.

Best,  
Meg  
(202) 343-9193

---

**From:** MongThu Ngo <[mongthu.ngo@basf.com](mailto:mongthu.ngo@basf.com)>  
**Sent:** Friday, February 14, 2020 12:31 PM  
**To:** Victor, Meg <[Victor.Meg@epa.gov](mailto:Victor.Meg@epa.gov)>  
**Subject:** RE: PMN status update

Hi Meg,

Since I don't see an end in sight, let's do a 30-day suspension to March 20<sup>th</sup>.

Best Regards,  
**MongThu Ngo, M.S., DABT**  
Product Regulations Specialist, Center of Expertise

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**From:** Victor, Meg <[Victor.Meg@epa.gov](mailto:Victor.Meg@epa.gov)>  
**Sent:** Friday, February 14, 2020 12:21 PM  
**To:** MongThu Ngo <[mongthu.ngo@basf.com](mailto:mongthu.ngo@basf.com)>  
**Subject:** RE: PMN status update

Hi MongThu,

February 19<sup>th</sup> is coming up next week, and I don't have an update from RAD on their review of the information that you provided. I recommend providing an additional suspension of 15 days to March 5<sup>th</sup>, or 30 days March 20<sup>th</sup>.

Best,  
Meg  
(202) 343-9193

---

**From:** Victor, Meg  
**Sent:** Tuesday, February 04, 2020 3:55 PM  
**To:** MongThu Ngo <[mongthu.ngo@basf.com](mailto:mongthu.ngo@basf.com)>  
**Subject:** RE: PMN status update

Hello MongThu,

My understanding is that the reason is workload, relating to the 2016 changes to the law, and the backlog that developed.

Best,  
Meg  
(202) 343-9193

---

**From:** Victor, Meg  
**Sent:** Tuesday, February 04, 2020 10:30 AM  
**To:** MongThu Ngo <[mongthu.ngo@basf.com](mailto:mongthu.ngo@basf.com)>  
**Subject:** RE: PMN status update

Hi MongThu,

Thanks. I will see what I can find out about this, and get back to you.

Best,  
Meg  
(202) 343-9193  
[victor.meg@epa.gov](mailto:victor.meg@epa.gov) \*Do not send Confidential Business Information to this email address\*  
Fax (202) 564-9490

---

**From:** MongThu Ngo <[mongthu.ngo@basf.com](mailto:mongthu.ngo@basf.com)>  
**Sent:** Monday, February 03, 2020 7:17 AM  
**To:** Victor, Meg <[Victor.Meg@epa.gov](mailto:Victor.Meg@epa.gov)>  
**Subject:** Re: PMN status update

Hi Meg,



We would like to do a 15 day suspension, Feb 19th. Do you know why the review period is taking so long under RAD? I want to know if there's a reason so I can go back to my colleagues with it.

Best Regards,  
MongThu Ngo

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**From:** Victor, Meg <[Victor.Meg@epa.gov](mailto:Victor.Meg@epa.gov)>  
**Sent:** Friday, January 31, 2020 3:49:26 PM  
**To:** MongThu Ngo <[mongthu.ngo@basf.com](mailto:mongthu.ngo@basf.com)>  
**Subject:** RE: PMN status update

Hello MongThu,

February 4<sup>th</sup> is coming up on Tuesday and, unfortunately, I have not received an update from RAD.

I recommend providing an additional 15-day suspension to February 19<sup>th</sup>, or a 30-day suspension to March 5<sup>th</sup>.

Best,  
Meg  
(202) 343-9193  
[victor.meg@epa.gov](mailto:victor.meg@epa.gov) \*Do not send Confidential Business Information to this email address\*  
Fax (202) 564-9490

---

**From:** MongThu Ngo <[mongthu.ngo@basf.com](mailto:mongthu.ngo@basf.com)>  
**Sent:** Friday, January 17, 2020 1:41 PM  
**To:** Victor, Meg <[Victor.Meg@epa.gov](mailto:Victor.Meg@epa.gov)>  
**Subject:** RE: PMN status update

Hi Meg,

It's unfortunate we have not received an update from RAD. We would like to do another 15-day suspension, with a new Day 90 of Feb 4.

Best Regards,  
**MongThu Ngo, M.S., DABT**  
Product Regulations Specialist, Center of Expertise

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**From:** Victor, Meg <[Victor.Meg@epa.gov](mailto:Victor.Meg@epa.gov)>  
**Sent:** Friday, January 17, 2020 11:28 AM  
**To:** MongThu Ngo <[mongthu.ngo@basf.com](mailto:mongthu.ngo@basf.com)>  
**Subject:** RE: PMN status update

Hi MongThu,

So far, I have not received any update from RAD on the status or timeline for their review. In the meantime, the day-90 is coming up again on Monday Jan 20<sup>th</sup>. I recommend providing a 15-day suspension (to Feb 4) or a 30-day suspension (to Feb 19).

Best,  
Meg  
(202) 343-9193  
[victor.meg@epa.gov](mailto:victor.meg@epa.gov) *\*Do not send Confidential Business Information to this email address\**  
Fax (202) 564-9490

---

**From:** Victor, Meg  
**Sent:** Friday, January 03, 2020 2:15 PM  
**To:** MongThu Ngo <[mongthu.ngo@basf.com](mailto:mongthu.ngo@basf.com)>  
**Subject:** RE: PMN status update

Hi MongThu,

I've asked RAD (Risk Assessment Division) for an update, and will let you know what I hear back from RAD.

Best,  
Meg  
(202) 343-9193

---

**From:** MongThu Ngo <[mongthu.ngo@basf.com](mailto:mongthu.ngo@basf.com)>  
**Sent:** Friday, January 03, 2020 11:59 AM  
**To:** Victor, Meg <[Victor.Meg@epa.gov](mailto:Victor.Meg@epa.gov)>  
**Subject:** RE: PMN status update

Hi Meg,

I agree – let's extend the Day 90 another 15 days to January 20. Did they Risk Assessment Division give you a tentative timeline or date when the review will be completed?

Happy New Year!

Best Regards,  
**MongThu Ngo, M.S., DABT**  
Product Regulations Specialist, Center of Expertise

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Postal Address: BASF Corporation, 24700 West Eleven Mile Road, 48034 Southfield, United States

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**From:** Victor, Meg <[Victor.Meg@epa.gov](mailto:Victor.Meg@epa.gov)>  
**Sent:** Friday, January 3, 2020 10:26 AM  
**To:** MongThu Ngo <[mongthu.ngo@basf.com](mailto:mongthu.ngo@basf.com)>  
**Subject:** RE: PMN status update

Hi MongThu,

The Risk Assessment Division has not yet completed review of the information that you provided, and the day-90 is coming up again this Sunday January 5<sup>th</sup>. I recommend providing an additional suspension, either 15 days (to Jan 20), or 30 days (to Feb 4).

Best regards, and Happy New Year,

Meg  
(202) 343-9193  
[victor.meg@epa.gov](mailto:victor.meg@epa.gov)

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**From:** Victor, Meg  
**Sent:** Wednesday, December 18, 2019 1:41 PM  
**To:** MongThu Ngo <[mongthu.ngo@basf.com](mailto:mongthu.ngo@basf.com)>  
**Subject:** RE: PMN status update

Will do, thanks, and Happy Holidays!

Meg

---

**From:** MongThu Ngo <[mongthu.ngo@basf.com](mailto:mongthu.ngo@basf.com)>  
**Sent:** Wednesday, December 18, 2019 1:38 PM  
**To:** Victor, Meg <[Victor.Meg@epa.gov](mailto:Victor.Meg@epa.gov)>  
**Subject:** RE: PMN status update

Dear Meg,

Thank you for informing me of the status and of the new Day 90. I would like to suspend it for another 15 days (Jan 5) and re-visit the status then.

Happy Holidays!

Best Regards,  
**MongThu Ngo, M.S., DABT**  
Product Regulations Specialist, Center of Expertise

Phone: +1 248 948-2037, Mobile: +1-248-238-7436, Email: [mongthu.ngo@basf.com](mailto:mongthu.ngo@basf.com)  
Postal Address: BASF Corporation, 24700 West Eleven Mile Road, 48034 Southfield, United States

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**From:** Victor, Meg <[Victor.Meg@epa.gov](mailto:Victor.Meg@epa.gov)>  
**Sent:** Wednesday, December 18, 2019 1:35 PM  
**To:** MongThu Ngo <[mongthu.ngo@basf.com](mailto:mongthu.ngo@basf.com)>  
**Subject:** RE: PMN status update

Hi MongThu,

The information that you submitted is undergoing review in the Risk Assessment Division. The "day-90" is coming up again on Dec 21. I recommend providing an additional suspension of 15 days (to Jan 5), or 30 days (to Jan 20). Please let me know which.

Thanks,  
Meg

Meg Victor  
New Chemicals Management Branch  
EPA/OCSP/OPPT/CCD  
(202) 343-9193  
[victor.meg@epa.gov](mailto:victor.meg@epa.gov)  
*\*Do not send Confidential Business Information to this email address\**

---

**From:** MongThu Ngo <[mongthu.ngo@basf.com](mailto:mongthu.ngo@basf.com)>  
**Sent:** Monday, October 21, 2019 8:46 AM  
**To:** Victor, Meg <[Victor.Meg@epa.gov](mailto:Victor.Meg@epa.gov)>  
**Subject:** RE: PMN status update

Hi Meg,

Thank you for reaching out to me. I was out of the office on Friday and did not get your phone call.

We would like to suspend the PMN for another 15 days. The document is undergoing several more revisions and will not be ready for submission by tomorrow. The new Day 90 will be November 6, 2019.

Best Regards,  
**MongThu Ngo, M.S., DABT**  
Product Regulations Specialist, Center of Expertise

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**From:** Victor, Meg <[Victor.Meg@epa.gov](mailto:Victor.Meg@epa.gov)>  
**Sent:** Friday, October 18, 2019 1:54 PM  
**To:** MongThu Ngo <[mongthu.ngo@basf.com](mailto:mongthu.ngo@basf.com)>  
**Subject:** PMN status update

Hi MongThu,

I just left you a voicemail message about the PMN that you and I recently discussed. After I left the voicemail, it occurred to me that although you're not listed on the PMN that I'm working on, you are listed on one that Jeff Bauer is assigned to, and so I looked up your email address on Jeff's PMN.

Anyway, I'm checking in about the status of the supporting information that you're working on.

Also, note that the "day-90" is coming up again this Tuesday October 22<sup>nd</sup>. Please let me know for how much additional time we should suspend it for.

Have a good weekend,  
Meg

Meg Victor  
New Chemicals Management Branch  
EPA/OCSP/OPPT/CCD  
(202) 343-9193